

William H. Gilliam, pro se  
9450 SW Gemini Dr.  
ECM 38146  
Beaverton, OR 97008  
Tel 808 647 0610

IN THE UNITED STATES BANKRUPTCY COURT

DISTRICT OF HAWAII

	)	
	)	
WILLIAM H GILLIAM	)	
	)	
	)	
	)	Case No. 19-01366
	)	
Debtor	)	Chapter 13
	)	
	)	MOTION FOR TURNOVER
	)	
	)	SQUARE, Inc. and JOHN DOE 1-
	)	10 AND JANE DOE 1-10
	)	
	)	

COMES NOW the debtor by the undersigned and respectfully states to the Court pursuant to 28 U.S.C.A. § 157. as follows:

1. Debtor holds accounts, money and information in data form with a brand of of Square, Inc. and Square, Inc. dba Square of California, Inc. called cash or WWW.Square.com/cash which brand and internet domain available in this State; and, with sufficient contacts with the State of Hawaii to confer jurisdiction and venue upon the above Court in this core proceeding.

2. John Doe 1-10 and Jane Doe 1-10 are the thieves and hackers who stole my square account, including monies, data, and credentials.
3. That Square's principal office is located in San Francisco and its principal and founder is Mr. Jack Dorsey, who also founded Twitter. Square does list several entities with the Hawaii DCCA, which include Square, Inc. and
4. That debtor's accounts and information under various electronic email labels included:
  - i. \$Pksurf2
5. That this court has previously ordered a turnover by Square, Inc. of the property stolen or converted by the hackers. However, since that Order and the satisfaction paid by Square, Inc. to the debtor additional funds were sent to the referenced account label.
6. As Square provides no live customer support, and contact with their in house counsel AND following to the letter the means to submit a request with no response, debtor has no choice but to again seek the Court's assistance; and more than forty days has elapsed.

WHEREFORE respectfully requests turnover of the current balance in the identified account in the amount of \$699.00

/s/ William H Gilliam

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#### CERTIFICATE OF SERVICE

I hereby certify that on the ninth day of September I post with the United States Postal Service postage prepaid an Original hereof to the Clerk of the Above Court and a copy of the foregoing addressed to the CEO of Square, Inc. one Jack Dorsey at Square, Inc. corporate office at Square Capital, LLC, 1455 Market St, Ste. 600, San Francisco, California, 94103, United States. Further, I have sent by email a copy hereof as a courtesy to the in-house counsel with whom I had contact in the previous matter one David Cannon at [dcannon@squareup.com](mailto:dcannon@squareup.com).

/s/ William H Gilliam

William H. Gilliam, plaintiff, pro se